

# **EXHIBIT 18**

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July 30, 2012

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Re: Nationwide v Keene  
O/File: 839576

Dear Mr. Bredell:

We have reviewed the documents you provided in response to the discovery requests.

There is missing information as follows. Would you kindly provide it ASAP per the court's order:

**17(e) Please provide all monthly statements or other such documents, from 1998 through 2010, for all financial accounts (savings accounts, investment accounts, checking accounts, money market accounts, 401(k) accounts, IRAs, stocks, investment accounts, etc.), including, but not limited to the following accounts:**

- a. Fidelity Account ending #6204
- b. The Bancorp Banc account ending #0878
- c. Accounts with Janus (as identified on US-1040)
- d. Accounts with Vanguard (as identified on US-1040)
- e. Accounts with DCFU Financial (as identified on US-1040)

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- f. Chase account ending #6635 (previously received 2005 through 2010)
  - g. Chase account ending #6764 (previously received 2005 through 2010)
  - h. All information for any accounts not previously provided
- 17(f) Please provide copies of all debt documents (personal loans, land contracts, promissory notes, mortgages, bank loans, business loans, credit cards, credit accounts, lines of credit, etc.), from 1998 through 2010 including, but not limited to the following accounts:**
- a. National City Home equity line of credit account ending #7813:
    - i. All statements except for statement ending March 10, 2010
  - b. Washington Mutual Account ending #1514:
    - i. Statements for all months except for October 17, 2006
  - c. Chase MasterCard account ending #0389:
    - i. All statements from 1998 to statement ending November 10, 2008
    - ii. Statement ending December 10, 2010
    - iii. Statement ending January 10, 2011
  - d. Chase credit card account ending #1499:
    - i. Statements ending May 15, 2006 through August 15, 2006
    - ii. Statements ending December 15, 2006 through November 11, 2008
    - iii. Statement ending January 15, 2009
    - iv. Statements ending August 15, 2009 through November 15, 2009
    - v. Statement ending October 15, 2010
    - vi. Statements ending December 15, 2010 and January 15, 2011
  - e. Home Depot Card account ending #2728:
    - i. All statements from 1998 to statement ending November 10, 2009
    - ii. Statement ending in September 2010
    - iii. Statements ending in November 2010 and December 2010
  - f. Costco Card account ending #1002:
    - i. All statements from 1998 to 2008
    - ii. Statement ending May 2009

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- g. National City Card account ending #9960:
  - i. All statements from 1998 to Statement ending November 2007
  - ii. Statement ending February 2010
  - iii. Statement ending July 2010
  - iv. Statements ending September 2010 through December 2010
- h. Citi Card account ending #7421:
  - i. All statements ending 1998 through 2008
- i. Citi Drivers Edge Card account ending #4617:
  - i. Statements ending 1998 through February 2006
  - ii. Statements ending December 2006 through 2010
- j. Elite Visa Credit Card account ending #9008:
  - i. Statements ending December 2006 through 2010
- k. All information for any accounts not previously provided

**17(g) Federal, State and local tax returns:**

- a. All tax records from 1998 through 2004

**17(g) Certified copies of all Federal, State and local tax returns for 1998 through 2011 for:**

- a. William Keene
- b. Jennifer Keene
- c. William and Jennifer Keene filed jointly

**18. Documentation regarding the income and expenses (including but not limited to, tax returns, financial statements, cash disbursement and cash receipt ledgers, monthly bank statements, etc.) for each of the following entities from 1998 through 2010:**

- a. B.K. Development, LLC

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b. BK 2 Development, LLC

c. GK Development, LLC

Very truly yours,  
HARVEY KRUSE, P.C.

Michael F. Schmidt

MFS:ja

cc: Jeffrey A. Danzig, Esq. - *j.danzig@fiegerlaw.com*  
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